

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

FREDERIC Z. KONIGSBERG, SUSAN M.
KONIGSBERG, BRADERMAK, LTD.,
BRADERMAK EQUITIES CORP., LEE
RAUTENBERG, JAN STAHL, GERI STAHL, H.
PETER STEIL, APO HEALTH, INC. PSP F/B/O
H. PETER STEIL, APO HEALTH, INC. PSP
F/B/O JAN STAHL, BUYER'S ALTERNATIVES,
INC. PSP F/B/O JAN STAHL, and PJS
TRADING, INC. PSP F/B/O JAN STAHL

Defendant.

Adv. Pro. No. 10-04394 (SMB)

**STIPULATION AND ORDER
REFERRING MATTER TO DISCOVERY ARBITRATOR**

WHEREAS, on December 1, 2010, Irving H. Picard (the "Trustee"), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et. seq.*, and the substantively consolidated estate of

Bernard L. Madoff individually, filed the above-captioned avoidance action against Frederic Z. Konigsberg, Susan M. Konigsberg, Bradermak, Ltd., Bradermak Equities Corp., Lee Rautenberg, Jan Stahl, Geri Stahl, H. Peter Steil, Apo Health, Inc. Psp F/B/O H. Peter Steil, APO Health, Inc. Psp F/B/O Jan Stahl, Buyer's Alternatives, Inc. Psp F/B/O Jan Stahl, And PJS Trading, Inc. Psp F/B/O Jan Stahl ("Defendants", and together with the Trustee, the "Parties");

WHEREAS on October 4, 2016, Judge Bernstein entered an Order Appointing a Discovery Arbitrator Pursuant to Bankruptcy Rule 9019(c) and General Order M-390 (the "October 4, 2016 Order") appointing the Honorable Frank Maas (ret.), c/o JAMS, Inc. as Discovery Arbitrator (the "Discovery Arbitrator") to resolve discovery disputes that may arise and which have been specifically referred to him by the Court with consent of the parties to the dispute.

NOW, THEREFORE, THE PARTIES TO THIS STIPULATION AGREE AND STIPULATE AS FOLLOWS:

1. The Parties agree that any dispute between them shall be resolved by the Discovery Arbitrator consistent with the procedures outlined in the October 4, 2016 Order.

4. The Parties agree that in the event of a dispute the Discovery Arbitrator shall thereafter establish procedures for resolution of the dispute, as contemplated in paragraph 8 of the October 4, 2016 Order.

5. Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have.

ORDERED, that this Court shall retain jurisdiction with respect to all matters relating to
the interpretation or implementation of this Order.

Dated: July 14, 2017
New York, New York

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and the estate of Bernard L. Madoff*

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Konigsberg, Susan M. Konigsberg, Bradermak,
Ltd., Bradermak Equities Corp., Lee
Rautenberg,*

So Ordered this 14th day of July, 2017.

/s/ STUART M. BERNSTEIN
HONORABLE STUART BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE